

BellSouth Telecommunications, Inc. 615 214-6301  
Suite 2101 Fax 615 214-7406  
333 Commerce Street  
Nashville, Tennessee 37201-3300

REC'D TN  
REGULATORY AUTH.  
BELL SOUTH

Guy M. Hicks  
General Counsel

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September 1, 1999

OFFICE OF THE  
EXECUTIVE SECRETARY

VIA HAND DELIVERY

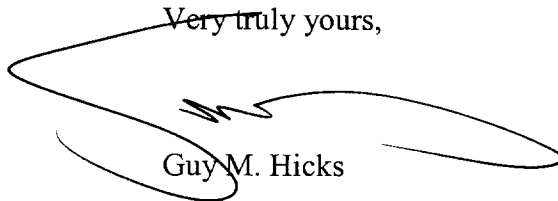
David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: Docket No. 99-00596

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s response to the Staff's Data Request. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

BellSouth Telecommunications, Inc.  
TN Docket 99-00596  
TRA First Data Request  
August 26, 1999  
Item No. 1  
Page 1 of 1

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REQUEST: In light of the Federal Act, please explain how BellSouth can logically offer its Billing and Collection Services directly to N11 subscribers, but propose to deny the service if a CLEC "... assumes responsibility for an N11 subscriber..."

A Staff review of four recent Resale Agreements submitted for approval by BellSouth in Docket Nos. 99-00032, 99-00232, 99-00232, 99-00364 and 99-00397 finds the following or similar language at Section 7.10 or Section VIIK:

The Company will not perform billing and collection services for Reseller as a result of the execution of this agreement. All requests for billing services should be referred to the appropriate entity or operational group within the Company.

Also, the Directors Acting as Arbitrators issued a Second and Final Order of Arbitration Awards in the matter of the Interconnection Agreement Negotiation between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252, on January 23, 1997. In this Order, Issue 1 addressed by the Arbitrators discussed which BellSouth services should be excluded from resale. At paragraph 8 the Arbitrators ordered:

That all services provided by BellSouth, with the exception of short-term promotions, as that term is defined below, should be, and are hereby are, made available by BellSouth for resale to AT&T and MCI

RESPONSE: Section 251(c)(4)(A) of the Telecommunications Act requires BellSouth "to offer for resale at wholesale rates any telecommunications service . . ." which it provides to its own customers. Billing and Collection Services are not telecommunications services as defined in the Act. Therefore, BellSouth is not required by the Act to offer Billing and Collection Services to CLECs.

We believe the statement quoted by the Staff from paragraph 8 refers to telecommunications services.

BellSouth Telecommunications, Inc.  
TN Docket 99-00596  
TRA First Data Request  
August 26, 1999  
Item No. 2  
Page 1 of 1

REQUEST: In light of the above Resale Agreement language and Arbitration Awards finding, please explain how a CLEC would utilize BellSouth's Billing and Collection Services, if it assumes responsibility for an N11 subscriber currently availing itself of those services. Further, explain why the restriction against resale of Billing and Collection Services for N11 Service is not an unreasonable or discriminatory condition or limitation on the resale of N11 service.

RESPONSE: See response to Item No. 1.